

**LAW OFFICE OF AMY JANE AGNEW**

Honorable Loretta A. Preska  
Senior Justice, United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

May 13, 2022

**VIA ECF**

**Re: *Allen, et al. v. NYS DOCCS, et al.*, 19-cv-8173 (LP)(SN)**

Dear Judge Preska:

This office represents Plaintiffs in the above-referenced matter. We write to respectfully request a four-day extension of the deadline for the filing of Plaintiffs' and Plaintiff-Intervenors' motion for injunctions. The current deadline is Monday, May 16, 2022 for both the class certification and injunction motions. We respectfully request until Friday, May 20, 2022 to file the injunction motion and supporting documents.

① The office has been working in a very steadfast manner to post the 25,000+ pages of medical records supporting our motions on ECF. We are now in the process of downloading them and will need a few extra days to cite to the record in the injunctions brief. We believe this will make things far, far easier for the Court and parties as these motions and the case move forward. We also await the completion of one other exhibit – the MWAP Request Form Directory. The document lists the relevant information for each MWAP Request Form produced as part of the DOCCS' directory. We have streamlined spelling errors and tidied information to make it usable. While we were originally going to redact the names and DIN #s we realized that a small bit of code could be written to assign monikers for each patient such as "Patient 1, Patient 2" designations. Again, this tweak will make it far easier for the Court and parties to follow how many distinct patients were affected by the MWAP policy and in what manner and when and how MWAP medications were ultimately discontinued on a patient-by-patient basis. A few lines of code are being drafted to add a column with the Patient numbers. We will, of course, produce a version with the names and DIN#s of all patients to Defendants' counsel (and the Court if requested) so they can compare to the original records for 1009 purposes.

② Defendants have consented to the brief extension and, in turn, have requested an extra week so they can serve their papers on July 8, 2022 and avoid the holiday. We have, of course, agreed to this request.

With thanks for the Court's continuing courtesies.

Very truly yours,

/s/ AJ Agnew

Amy Jane Agnew, Esq.

So ordered  
Loretta A. Preska

5/13/22